

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DAVID WAWRZYNSKI,

Plaintiff,

Civil Action No. 11-1098

ELECTRONICALLY FILED

v.

H.J. HEINZ COMPANY, H.J. HEINZ
COMPANY, L.P., & HEINZ GP LLC,

Defendants.

FINAL VERDICT FORM

A. General Questions

1. Did Plaintiff prove by a preponderance of evidence that he presented a concrete, new, and novel idea(s), or a concrete, new, and novel compilation of ideas, to Defendants concerning a new single-serving ketchup packet?

Answer: Yes (yes or no)

If you answered "yes" to Question 1, please answer Question 2.

If you answered "no" to Question 1, stop and go to the end of this verdict form, have the foreperson sign and date it, and give it to the courtroom deputy.

2. Did Plaintiff prove by a preponderance of the evidence that Defendants used his concrete, new, and novel idea(s), or a concrete, new, and novel compilation of ideas, in the development, branding and marketing of a new single-serving ketchup packet?

Answer: NO (yes or no)

If you answered "yes" to Question 2, please answer Question 3.

If you answered "no" to Question 2, stop and go to the end of this verdict form, have the foreperson sign and date it, and give it to the courtroom deputy.

B. Implied Contract

3. Did Plaintiff prove by a preponderance of the evidence that Defendants agreed to pay Plaintiff if they used his idea or ideas?

Answer: _____ (yes or no)

If you answered "yes" to Question 3, stop and go to the end of this verdict form, have the foreperson sign and date it, and give it to the courtroom deputy.

If you answered "no" to Question 3, please answer Question 4.

C. Unjust Enrichment

4. Did Plaintiff prove by a preponderance of the evidence that he conferred a benefit upon Defendants and it would be unfair if Defendants did not pay Plaintiff for the benefit he provided to Defendants?

Answer: _____ (yes or no)

SO SAY WE ALL this 1st day of April, 2015.

Al M. B. i

Charles Lee

RENEE

Tom Chubb

Lawrence T. H. H.

SPR

Joseph K. G. H. H.

CHUBB